Remarks

Applicant has carefully studied the office action mailed July 7, 2009, and submits the following remarks.

Rejection of claims 43-45, 48-51, 54-60, 63-72, 76-80, 84, and 85

The examiner rejected new claims 43-45, 48-51, 54-60, 63-72, 76-80, 84, and 85 as obvious over U.S. Patent No. 6,663,767 to Berlowitz ("Berlowitz"). The examiner found Applicant's arguments related to new claims 43-85 to be unpersuasive. The examiner contends that the method of the independent claims essentially comprises the step of combustng in the diesel engine a fuel blend comprising an amount of Fischer-Tropsch derived gas oil, which the examiner contends is "clearly taught by Berlowitz."

The examiner admits that "reducing injector fouling and/or engine deposits is not specifically set forth in Berlowitz." Office action, p. 3. However, the examiner contends that "reduction of particulate matter is briefly discussed in column 7, lines 37-40, and it is has been held that the discovery of a previously unappreciated property of a prior art composition, or a scientific explanation for the prior art's functioning, does not render the old composition patentably new to the discoverer." Citing *Atlas Powder Co. v. Ireco, Inc.*, 190 F.3d 1342, 1347, 51 USPQ2d 1943, 1947 (Fed. Cir. 1999), Office action, pp. 3-4. The examiner also contends that "claiming of a new use, new function or unknown property which is inherently present in the prior art does not necessarily make the claim patentable." Citing *In re Best*, 562 F2d 1252, 1254, 195 USPQ 430, 433 (CCPA 1977).

The examiner maintains the position that Berlowitz meets the limitations of the claims.

Response

***Best* and *Atlas Powder* are inapplicable**

Claims 43-45, 48-51, 54-60, 63-72, 76-80, 84, and 85 are **method claims**.

The examiner has not established that the pending **method claims** are **product claims** that read on "prior art products [that] are identical or substantially identical, or are produced by identical or substantially identical processes." *In re Best*, 195 USPQ 430, 433-434 (C.C.P.A. 1977) [Citation omitted]; see *Atlas Powder Co. v. Ireco Inc.*, 51 U.S.P.Q.2d 1943, 1944 (Fed. Cir. 1999). Because of this, *In re Best* and *Atlas Powder* do not apply to the facts of the present case.

-In re Best

The portion of *In re Best* cited by the examiner relates to product claims. The relevant independent product claim reads as follows:

> 1. A crystalline zeolitic aluminosilicate having a SiO_2/Al_2O_3 molar ratio of from 4.6 to 5.4, a face centered cubic unit cell having an a_0 of greater than 24.45 to 24.55A, an Na_2O/Al_2O_3 molar ratio of not greater than 0.25, **an adsorptive capacity** in the dehydrated state for oxygen of at least 26 weight per cent at 100 mm Hg oxygen pressure and -183°C., **an ion exchange capacity** of from 0.15 to 0.35 and having the essential X-ray powder diffraction pattern of zeolite Y with the proviso that the d-spacing thereof having the Miller Indices 331 is at least as great in intensity as the line thereof having the Miller Indices 533.

In re Best, 195 USPQ at 431 (emphasis added). The CCPA found that the cited reference disclosed "SiO_2/Al_2O_3 and Na_2O/Al_2O_3 molar ratios within the ranges recited in claim 1, but [did] not specifically disclose the other parameters." *Id.* at 434. The Appellant urged "that the other parameters are the unique result of their claimed process [but] offered no comparison of those other parameters with the corresponding parameters of" the product described in the cited reference. *Id.*

The CCPA held that "[w]here, as here, **the claimed and prior art *products*** are identical or substantially identical, or are produced by identical or substantially identical processes, the PTO can require an applicant to prove that the prior art products do not necessarily or inherently possess the characteristics of his claimed product." *In re Best*, 195 USPQ 430, 433-434 (C.C.P.A. 1977)(emphasis added) [Citation omitted]. Whether the rejection is based on "inherency" under 35 USC 102, on "prima facie obviousness" under 35 USC 103, jointly or alternatively, the burden of proof is the same, and its **fairness is evidenced by the PTO's**

inability to manufacture *products* or to obtain and compare prior art *products*." *Id.* at 434 {citation omitted)(emphasis added).[1]

It might be necessary for the PTO to manufacture a prior art product in order to assess whether the prior art product meets functional limitations of a **product** claim. However, the PTO would not have to manufacture a product in order to determine whether a reference anticipates or renders a **method** or process claim anticipated or obvious. An examiner can tell **from the face of a reference** whether or not a particular method or process limitation is performed in the reference.

The pending claims are not product claims. All of the pending claims are **method** claims. The rationale stated in *In re Best* does not apply to the pending method claims.

-Atlas Powder

Claim 1 of the patent at issue in *Atlas* also was a product claim directed to a

> **blasting composition** consisting essentially of 10 to 40% by weight of a greasy water-in-oil emulsion and 60 to 90% of a substantially undissolved particulate solid oxidizer salt constituent, wherein the emulsion comprises about 3 to 15% by weight of water, about 2 to 15% of oil, 70 to 90% of powerful oxidizer salt comprising ammonium nitrate which may include other powerful oxidizer salts, wherein the solid constituent comprises ammonium nitrate and *in which sufficient aeration is entrapped to enhance sensitivity to a substantial degree*, and wherein the emulsion component is emulsified by inclusion of 0.1 to 5% by weight, based on the total composition, of an [oil-in-water] *water-in- oil* emulsifier to hold the aqueous content in the disperse or internal phase.

Atlas, 51 USPQ2d at 1944.

The compositions described in the cited references "disclose[d] blasting compositions containing a water-in-oil emulsion and ANFO [ammonium nitrate and fuel oil] with ingredients identical to those of the [prior art] patents in overlapping amounts." The issue was whether the references met the limitation that "*sufficient aeration is entrapped to enhance sensitivity to a substantial degree.*" Addressing an anticipation rejection under 35 U.S.C. § 102, the Federal Circuit stated that "the discovery of a previously unappreciated property of a prior art **composition**, or of a scientific explanation for the prior art's functioning, does not render the old

[1]The CCPA affirmed the rejection of the product claims under 35 U.S.C. §102 or §103. *Id.*

composition patentably new to the discoverer." *See id.* at 782 (emphasis added) ("Congress has not seen fit to permit the patenting of an **old [composition]**, known to others . . . , by one who has discovered its . . . useful properties."); *Verdegaal Bros.* , 814 F.2d at 633 (emphasis added).

The pending claims are not "product" or "composition" claims. Independent claims 43 and 50 are directed to a "**method** for removing injector fouling in a diesel engine." (Emphasis added). Claim 78 is directed to a "**method** for removing combustion related deposits in a diesel engine. (Emphasis added). Claim 59 is directed to a **method** for reducing injector fouling in a diesel engine. (Emphasis added). And claim 70 is directed to a "**method** for reducing combustion related deposits in a diesel engine." (Emphasis added).

The facts of *Best* and *Atlas* simply do not relate to the facts of this case because the examiner has not established that the pending **method claims** are directed to **an old composition** in terms of a function, property or characteristic of the composition.

As seen from the following discussion, the rejection should be withdrawn because the examiner has not met the flexible TSM test with respect to the pending method claims. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d 1196, 1201-02 (Fed. Cir. 2008). The examiner also has not established that the pending method claims are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 127 S.Ct. 1727, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007) (emphasis added).

-Claim 43-49

Claim 43, directed to a "**method** for removing injector fouling in a diesel engine," specifies "**providing a *fouled* diesel engine** comprising **an initial level of *injector fouling***, as evidenced in the laboratory by an initial fouling index." (Emphasis added). New claim 43 then specifies "**removing at least some of the initial level of injector fouling**, producing a cleaned diesel engine having a reduced level of injector fouling, as evidenced during laboratory testing by a reduced fouling index." (Emphasis added).

As explained in the specification, "[c]ompression-ignition (diesel) engines running on conventional diesel fuels can suffer from the build up of combustion related deposits in their fuel injection systems, **in particular in the injector nozzles**." Specification, p. 1, ll. 22-25. The

specification explains that "this injector fouling can impair engine performance." *Id.* The specification further explains that "[t]o reduce fouling, a detergent-containing additive may be included in the fuel, or the proportion of heavier components in the fuel may be adjusted so as to lower its endpoint." Specification, p. 1, l. 26- p. 2, l. 2. The specification also explains that "[i]t has now been found that Fischer-Tropsch derived fuels can themselves contribute to a reduction in, and/or reversal of, injector fouling." Specification, p. 2, ll. 3-5.

The examiner has not pointed to a teaching or suggestion in Berlowitz to provide a fouled diesel engine having an initial fouling index for any particular reason. The examiner has not pointed to a teaching or suggestion in Berlowitz to remove at least some of the initial level of injector fouling from the fouled diesel engine. The examiner certainly has not pointed to a teaching or suggestion in Berlowitz that some of the initial level of injector fouling could have been removed merely by "combusting in the diesel engine a fuel blend comprising a sufficient amount of Fischer-Tropsch derived gas oil to produce the cleaned diesel engine." Claim 43. The examiner has not established that removing injector fouling is an **established function** of the claimed fuel blend. *KSR*, 82 U.S.P.Q.2d at 1396.

The examiner has not pointed to a teaching, suggestion, or other motivation in Berlowitz or elsewhere to perform the method in the fashion of claim 43.

The examiner certainly has not pointed to a teaching, suggestion, or any other indication in Berlowitz or elsewhere that "combusting in the diesel engine a fuel blend comprising a sufficient amount of Fischer-Tropsch derived gas oil to produce the cleaned diesel engine" could produce a "reduced fouling index [that] is 6% or more lower than the initial fouling index." Claim 44. Nor has the examiner pointed to a teaching, suggestion, or any other indication in Berlowitz or elsewhere to use a fuel blend comprising "a standard diesel fuel composition comprising less than 1% w/w Fischer-Tropsch derived gas oil, the method further comprising increasing the removal of the initial level of injector fouling by increasing the amount of the Fischer-Tropsch derived gas oil in the fuel blend, the increase in removal being evidenced in the laboratory by a further reduced fouling index." Claim 45. The examiner has not pointed to a teaching, suggestion, or any other indication in Berlowitz or elsewhere of a method "further comprising increasing the removal of the initial level of injector fouling by providing the fuel blend with a sufficient quantity of detergent to produce a further reduced fouling index during laboratory testing." Claims 46-47.

The examiner also has not pointed to a teaching or suggestion of a method meeting the limitations of claim 43, as discussed above, wherein "the Fischer Tropsch derived gas oil comprises 95% w/w or greater components having boiling points of from about 150 to about 400°C"—**the boiling range of typical diesel fuels**. Claim 48; specification, p. 2, l. 29; claims 12 and 21. As explained previously, Berlowitz' states that his "blend . . . provides a fuel having reduced sulfur levels and emissions levels lower than those predicted by standard correlations . . . by eliminating the heavy end of the conventional diesel fuel and **replacing the heavy end with a low sulfur Fischer-Tropsch derived diesel fuel *boiling above the range of a normal diesel fuel.*"** Berlowitz, col. 2 ll. 53-60 (emphasis added). The examiner certainly has not pointed to a teaching or suggestion of a method meeting the limitation of claim 49, specifying that "the Fischer-Tropsch derived gas oil has a 90% w/w distillation temperature of **from 300 to 370 °C**." Claim 49 (emphasis added). The examiner has not established that Berlowitz' Fischer-Tropsch derived hydrocarbon distillate meets the limitations of dependent claims 48-49 for these additional reasons.

As seen from the foregoing, the examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 43, or dependent claims 44-49, and has not met the flexible TSM test with respect to claims 43-49. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d at 1201-02. Nor has the examiner established that claim 43, or dependent claims 44-49, are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396.

Applicant respectfully requests that the rejection of claims 43-49 over Berlowitz be withdrawn.

-Claims 50-58

Claim 50 is directed to a "**method** for removing injector fouling in a diesel engine." Claim 50 is similar to claim 43, but specifies that the removing comprises "combusting in the diesel engine a fuel blend effective to produce the cleaned diesel engine, the fuel blend comprising a standard diesel fuel composition comprising less than 1 %w/w Fischer-Tropsch derived gas oil and an amount of 0.5 % w/w or more Fischer-Tropsch derived gas oil." The

examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of independent claim 50 for this additional reason.

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 51, which specifies "increasing the removal of the initial level of injector fouling by increasing the amount of the Fischer-Tropsch derived gas oil in the fuel blend, the increase in removal being evidenced in the laboratory by a more reduced fouling index."

Nor has the examiner pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claims 52-53, which specify "increasing the removal of the initial level of injector fouling by providing the fuel blend with a sufficient quantity of detergent to produce a further reduced fouling index during laboratory testing."

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 56, which specifies that "95% w/w or more of components of the 0.5 % w/w or more Fischer-Tropsch derived gas oil have boiling points of from about 150 to about 400°C." The examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 57, which specifies that "95% w/w or more of components of the 0.5 % w/w or more Fischer-Tropsch derived gas oil have boiling points of from about 170 to about 370°C." Nor has the examiner pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 58, which specifies that "the 0.5 % w/w or more Fischer-Tropsch derived gas oil has a 90% w/w distillation temperature of from 300 to 370 °C."

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz, or elsewhere, of the limitations of claims 54-55, which depend from claim 51 and specify "increasing the amount of the Fischer-Tropsch derived gas oil to about 10% w/w or more of the fuel blend" (claim 54) and "to about 30% w/w or more of the fuel blend" (claim 55).

As seen from the foregoing, the examiner has not pointed to teaching, suggestion, or other indication in Berlowitz of every limitation of claim 50, or dependent claims 51-58, and has not met the flexible TSM test with respect to claims 50-58. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d at 1201-02. Nor has the examiner established that claims 50-58 are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396.

Applicant respectfully requests that the rejection of claims 50-58 over Berlowitz be withdrawn.

-**Claims 70-77**

Claim 70 is directed to a "method for **reducing** combustion related deposits in a diesel engine." The examiner has not pointed to a teaching or suggestion or anything else in Berlowitz of a method comprising "introducing into a combustion chamber of the diesel engine a fuel blend comprising (a) a standard diesel fuel composition comprising less than 1 w/w% Fischer-Tropsch derived gas oil, and (b) an amount of about 5 w/w% or more of Fischer-Tropsch derived gas oil comprising 95% w/w or greater components having boiling points of from about 150 to about 400°C." (Claim 70). The examiner also has not established that "the diesel engine running on the fuel blend [could produce] a reduced quantity of engine fouling, as evidenced in the laboratory by a reduced fouling index" compared to an "initial fouling index" produced by "the diesel engine running on the standard diesel fuel composition." (Claim 70).

The examiner also has not established that performing the method could produce a "reduced fouling index [that] is 6% or more lower than the initial fouling index" (claim 71), or "9% or more lower than the initial fouling index" (claim 72). Nor has the examiner established that Berlowitz, or any other reference, teaches, suggest, or otherwise would motivate a person of ordinary skill in the art to "provid[e] the fuel blend with a sufficient quantity of detergent to produce a more reduced quantity of engine fouling during laboratory testing." (Claims 74-75).

As seen from the foregoing, the examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 70, or dependent claims 71-77, and has not met the flexible TSM test with respect to claims 70-77. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d at 1201-02. Nor has the examiner established that claims 70-77 are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396.

Applicant respectfully requests that the rejection of claims 70-77 over Berlowitz be withdrawn.

-Claims 78-85

Claim 78 is directed to a "method for removing combustion related deposits in a diesel engine." The examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of a method comprising the limitation of "operating a diesel engine using a standard diesel fuel composition comprising less than 1 w/w% Fischer-Tropsch derived gas oil, producing engine fouling comprising a quantity of combustion related deposits, as evidenced in the laboratory by an initial fouling index." Nor has the examiner pointed to a teaching, suggestion, or other indication in Berlowitz of a method further comprising "thereafter operating the diesel engine using a fuel blend comprising an amount of the Fischer-Tropsch derived gas oil sufficient to reduce the quantity of combustion related deposits, as evidenced in the laboratory by a reduced fouling index, the Fischer-Tropsch derived gas oil comprising 95% w/w or greater components having boiling points of from about 150 to about 400°C."

The examiner also has not established that performing the method could produce a "reduced fouling index [that] is 6% or more lower than the initial fouling index" (claim 79), or "9% or more lower than the initial fouling index" (claim 80). Nor has the examiner established that Berlowitz, or any other reference, teaches, suggest, or otherwise would motivate a person of ordinary skill in the art to "provid[e] the fuel blend with a sufficient quantity of detergent to produce a more reduced quantity of engine fouling during laboratory testing." (Claims 81-83).

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz, or elsewhere, of the limitations of claims 84-85, which depend from claims 78 and 81, respectively, and specify "increasing the amount of the Fischer-Tropsch derived gas oil to about 10% w/w or more of the fuel blend" (claim 84) or "to about 30% w/w or more of the fuel blend" (claim 85).

As seen from the foregoing, the examiner has not pointed to teaching, suggestion, or other indication in Berlowitz of every limitation of claim 78, or dependent claims 79-85, and has not met the flexible TSM test with respect to claims 78-85. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d at 1201-02. Nor has the examiner established that claims 78-85 are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396.

Applicant respectfully requests that the rejection of claims 78-85 over Berlowitz be withdrawn.

-Claims 59-69

Claim 59 is directed to a "method for reducing injector fouling in a diesel engine." The examiner has not pointed to teaching, suggestion, or other indication in Berlowitz of every limitation of a method comprising the limitation of "providing a diesel engine exhibiting an initial level of injector fouling, as evidenced in the laboratory by an initial fouling index; and, operating the diesel engine using a fuel blend comprising a sufficient amount of Fischer-Tropsch derived gas oil to maintain or reduce the initial level of injector fouling."

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 60, which specifies reducing the initial level of injector fouling by "increasing the amount of the Fischer-Tropsch derived gas oil in the fuel blend, the increase in removal being evidenced in the laboratory by a more reduced fouling index."

Nor has the examiner pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claims 61-62, which specify "reducing the initial level of injector fouling by providing the fuel blend with a sufficient quantity of detergent to produce a further reduced fouling index during laboratory testing."

The examiner also has not pointed to a teaching, suggestion, or other indication in Berlowitz, or elsewhere, of the limitations of claims 63-64, which depend from claim 60, and specify "increasing the amount of the Fischer-Tropsch derived gas oil to about 10% w/w or more of the fuel blend" (claim 63) or "to about 30% w/w or more of the fuel blend" (claim 64).

The examiner also has not established that performing the method could produce a "reduced fouling index [that] is 6% or more lower than the initial fouling index" (claims 65), or "9% or more lower than the initial fouling index" (claims 66-67).

The examiner has not pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 68, which specifies that "95% w/w or greater of components of the Fischer-Tropsch derived gas oil have boiling points of from about 170 to about 370°C." Nor has the examiner pointed to a teaching, suggestion, or other indication in Berlowitz of every limitation of claim 69, which specifies that "the Fischer-Tropsch derived gas oil has a 90% w/w distillation temperature of from 300 to 370 °C."

As seen from the foregoing, the examiner has not pointed to teaching, suggestion, or other indication in Berlowitz of every limitation of claim 59, or dependent claims 60-69, and has not met the flexible TSM test with respect to claims 59-69. *Ortho-McNeil Pharmaceutical, Inc.*

v. Mylan Laboratories, Inc., 86 U.S.P.Q.2d at 1201-02. Nor has the examiner established that claims 59-69 are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396.

Applicant respectfully requests that the rejection of claims 59-69 over Berlowitz be withdrawn.

Rejection of Claims 46, 47, 52, 53, 61, 62, 73-75 and 81-83 over Berlowitz in view of Bacha

The examiner also rejected claims 46, 47, 52, 53, 61, 62, 73-75 and 81-83 as obvious over Berlowitz in view of U.S. Patent No. 6,776,897 to Bacha et al. ("Bacha"). The examiner admits that adding a detergent to the diesel fuel blend "is not taught in Berlowitz." Office action, p. 4. The examiner contends that Bacha teaches that diesel fuel compositions containing Fischer-Tropsch derived diesel fuels may comprise conventional additives such as detergents.

Response

Claims 46, 47, 52, 61, 62, 73-75, and 81-83 depend from and, directly or indirectly, include the limitations of the claims 43, 50, 59, 70, or 78, respectively, and are allowable for the reasons discussed above.

The examiner also has not pointed to a teaching, suggestion, or any other indication in Berlowitz, Bacha, or elsewhere of a method comprising every limitations of the respective independent claims. Nor has the examiner pointed to a teaching, suggestion, or any other indication in Berlowitz, Bacha, or elsewhere of a method "further comprising increasing the removal of the initial level of injector fouling by providing the fuel blend with a sufficient quantity of detergent to produce a further reduced fouling index during laboratory testing." Claims 46-47. *See also* claims 52, 61, 62, 73-75, and 81-83.

The examiner has not pointed to teaching, suggestion, or other indication in Berlowitz, Bacha, or elsewhere of every limitation of claims 46, 47, 52, 61, 62, 73-75, and 81-83. The examiner therefore has not met the flexible TSM test with respect to claims 46, 47, 52, 61, 62, 73-75, and 81-83. *Ortho-McNeil Pharmaceutical, Inc. v. Mylan Laboratories, Inc.*, 86 U.S.P.Q.2d at 1201-02. The examiner has not established

that claims 46, 47, 52, 61, 62, 73-75, and 81-83 are directed merely to "the **predictable use of prior art elements according to their established functions**." *KSR Int'l Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d at 1396. Nor has the examiner established that Bacha provides an apparent reason to combine known elements **in the fashion of claims** 46, 47, 52, 61, 62, 73-75, and 81-83. *Id.* (emphasis added).

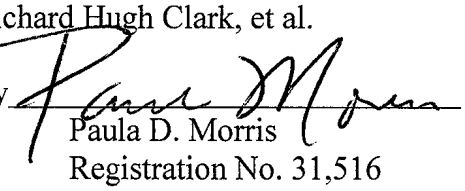
Applicant respectfully requests that the rejection of claims 46, 47, 52, 61, 62, 73-75, and 81-83 over Berlowitz be withdrawn.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests reconsideration and allowance of all of the pending claims. The Commissioner is hereby authorized to charge any fee in connection with this paper to Deposit Account No. **19-1800 (File no. TS7607)**, maintained by Shell Oil Company

Respectfully submitted,

Richard Hugh Clark, et al.

By 

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